

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHAEL WISNEFSKI,
Plaintiff,

v.

MICKEY GROUP INC. and ALEX
RABENS,
Defendants.

Case No. 1:23-cv-04984

District Judge Ellis

Magistrate Judge Kim

JOINT MOTION TO EXTEND THE DISCOVERY DEADLINE

The Parties, by and through their respective undersigned counsel, jointly move to extend the discovery deadline, pursuant to Federal Rule of Civil Procedure 16(b)(4). In support of this motion, the Parties state as follows:

1. The deadline for completing fact discovery is currently March 15, 2024. (D.E. 14.) In setting this deadline, the Court adopted the date the Parties proposed in their joint initial status report. (*Id.*; *see* D.E. 13 at 2.)

2. The Parties request additional time to complete oral discovery due to the press of other business. The Parties have begun the process of conferring to schedule depositions during April 2024.

3. Additionally, the Parties are working to resolve disputes regarding written discovery and negotiate search terms to narrow the scope of ESI. The Parties are hopeful that they can resolve these issues without Court intervention and request additional time to do so.

4. This is the first request for an extension of the discovery deadline by either of the Parties.

5. The Parties assert that the above reasons provide “good cause” to extend the discovery deadline under Federal Rule of Civil Procedure 16(b)(4).

6. The Parties agree that an additional 60 days will provide enough time to complete fact discovery. Accordingly, the Parties request that the Court extend the discovery deadline to May 14, 2023.

7. The Parties also request that the Court extend the March 20, 2024 deadline for the Parties to file a joint status report regarding the status of discovery and related issues to May 19, 2024. (*See* D.E. 14.)

For the reasons discussed above, the Parties respectfully request that the Court grant their joint motion and extend the discovery deadline by 60 days.

Date: February 29, 2024

Respectfully submitted,

MICHAEL WISNEFKSI

/s/ Andrew J. Cuniff

John D. Galarnyk, Esq.
Andrew J. Cuniff, Esq.
John A. Romanucci, Esq.
GALARNYK & ASSOCIATES, LTD.
55 West Monroe Street
Suite 3600
Chicago, IL 60603
john@galarnykltd.com
andrew@galarnykltd.com
johnr@galarnykltd.com

Attorneys for Plaintiff

MICKEY GROUP INC. AND ALEX
RABENS

/s/ Benjamin S. Morrell

Benjamin S. Morrell
Elizabeth C. Wellhausen
TAFT STETTINIUS & HOLLISTER LLP
111 E. Wacker Drive, Suite 2600
Chicago, IL 60601
312-527-4000
bmorrell@taftlaw.com
ewellhausen@taftlaw.com
Firm I.D. No. 29143

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the date listed below, I filed the foregoing document with the Clerk of the Court using the Court's CM/ECF filing system, which will send notice of such filing to all counsel of record.

Date: February 29, 2024

/s/ Benjamin S. Morrell
Counsel for Defendants